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 7 CHASE HOME FINANCE, LLC

8 **UNITED STATES DISTRICT COURT**  
 9 **NORTHERN DISTRICT OF CALIFORNIA**

11 HOAN PHAM, ) Case No. CV 13-01843 HRL  
 12 Plaintiff, )  
 13 vs. ) **STIPULATION TO MODIFY CASE**  
 14 ) **MANAGEMENT ORDER AS TO EXPERT**  
 15 ) **DISCOVERY CUTOFF; [PROPOSED]**  
 16 ) **ORDER**  
 17 REDLINE RECOVERY SERVICES, LLC; )  
 18 JP MORGAN CHASE BANK, N.A.; and )  
 19 CHASE HOME FINANCE, LLC, )  
 20 )  
 21 Defendants. )

22 Plaintiff HOAN PHAM (“Plaintiff”) and Defendants JPMORGAN CHASE BANK, N.A.,  
 23 successor by merger to CHASE HOME FINANCE, LLC (“Chase”) and REDLINE RECOVERY  
 24 SERVICES, LLC (“Redline”) (collectively, the “Parties”), by and through their respective counsel of  
 25 record, hereby stipulate and agree as follows:

26 WHEREAS, on July 31, 2013, this court issued a Case Management Order providing for an  
 27 expert discovery cut-off date of March 18, 2014, with designation of experts with reports due on  
 28 February 11, 2014, and designation of rebuttal experts with reports due on March 4, 2014;

1 WHEREAS, the parties are currently engaged in settlement discussions, and wish to extend the  
 2 expert witness-related deadlines in order to continue to facilitate those discussions;

3 WHEREAS, the parties are desirous of changing the deadlines for the designation of experts  
 4 with reports to March 18, 2014, the designation of rebuttal experts with reports to April 8, 2014, and  
 5 the expert discovery cut-off date to April 22, 2014;

6 WHEREAS, good cause exists to enter an order modifying the expert discovery cut-off date in  
 7 that it will not affect any other date in the current Case Management Order, including the date of the  
 8 Pretrial Conference;

9 IT IS HEREBY STIPULATED by and between all parties to this action through their  
 10 respective counsel that the discovery cut-off date should be reset to April 22, 2014, with the deadline  
 11 for the designation of experts with reports reset to March 18, 2014, and the deadline for the  
 12 designation of rebuttal experts with reports reset to April 8, 2014.

13  
 14 DATED: February 11, 2014

/s/ Jessica Luhrs

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 16 PHILIP A. MCLEOD  
 17 JESSICA LUHRS  
 18 KEEBAL, YOUNG & LOGAN  
 19 Attorneys for Defendant JPMORGAN CHASE  
 20 BANK, N.A., successor by merger to  
 21 CHASE HOME FINANCE, LLC

22 DATED: February 11, 2014

/s/ James F. Hetherington

23 JAMES F. HETHERINGTON  
 24 GOODMAN NEUMAN HAMILTON LLP  
 25 Attorney for Defendant REDLINE RECOVERY  
 26 SERVICES, LLC

//

1 DATED: February 11, 2014

/s/ Annette D. Kirkham

2 ANNETTE D. KIRKHAM

3 FAIR HOUSING LAW PROJECT

4 LAW FOUNDATION OF SILICON VALLEY

5 Attorney for Plaintiff HOAN PHAM

6 *Filer's Attestation: Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, Jessica Luhrs hereby*  
*attests that concurrence in the filing of this document has been obtained.*

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1  
2 [PROPOSED] ORDER  
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4 PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED  
5 THAT the Case Management Order issued July 31, 2013 should be and hereby is modified to reflect a  
6 Exert Witness Discovery Cutoff date of April 22, 2014.

7 IT IS SO ORDERED.  
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9 Dated: February 11, 2014  
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Magistrate  
The Honorable Judge Howard R. Lloyd